

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Angel Hughes)	
)	Case No: 17 B 11836
)	Judge: Doyle
Debtor)	Chapter 13

NOTICE OF MOTION

Served upon the following parties electronically:

Office of United States Trustee, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

Trustee: Tom Vaughn, 55 E. Monroe Street, Ste. 3850, Chicago, IL 60603

and served upon the following parties via U.S. Mail:

Debtor: Angel Hughes, 37 N. Latrobe Ave., Chicago, IL 60644

See Attached Service List

PLEASE TAKE NOTICE that on August 7, 2018 at 10:00 a.m.,
or as soon thereafter as I may be heard, I shall appear before the Honorable Judge
Doyle, or any other Bankruptcy Judge presiding in her place in Courtroom 742 of the
Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, on the attached Motion
to Modify Plan, and shall request that the attached Order be entered, at which time you
may appear if so desired.

PROOF OF SERVICE

I, The undersigned, an attorney, hereby certify that a copy of this notice was served electronically or mailed to the above persons, at her respective addresses, postage prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before 6:00 p.m. on or before July 6, 2018.

/s/ Michelle K. Hinds
Michelle K. Hinds
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606
312-273-5001

Label Matrix for local noticing
0752-1
Case 17-11836
Northern District of Illinois
Chicago
Fri Jul 6 13:14:05 CDT 2018

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Americash Loans, L.L.C.
P.O. Box 184
Des Plaines, IL 60016-0003

Brandon S. Lefkowitz
24100 Southfield Road
Suite 203
Southfield, MI 48075-2851

Capital One
Attn: General Correspondence/Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

City of Chicago Department of Finance
c/o Arnold Scott Harris
111 W Jackson Blvd Ste 600
Chicago, IL 60604-3517

City of Chicago Parking
Dept of Revenue
PO Box 88292
Chicago, IL 60680-1292

Comenity Bank/Lane Bryant
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

Fed Loan Sevicng
Po Box 69184
Harrisburg, PA 17106-9184

First Premier Bank
601 S Minneapolis Ave
Sioux Falls, SD 57104

PLS Loan Store
1617 N. Cicero
Chicago, IL 60639-4519

PRESTIGE FINANCIAL SERVICES
PO BOX 26707
SALT LAKE CITY, UT 84126-0707

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Premier Bankcard, LLC
Jefferson Capital Systems, LLC Assignee
PO BOX 7999
SAINT CLOUD MN 56302-7999

(p)PRESTIGE FINANCIAL SERVICES
PO BOX 26707
SALT LAKE UT 84126-0707

Regional Acceptance Co
304 Kellm Road
Virginia Beach, VA 23462-2712

Synchrony Bank/ Old Navy
Attn: Bankruptcy
Po Box 956060
Orlando, FL 32896-0001

The Payday Loan Store
c/o Creditors Bankruptcy Service
P O Box 800849
Dallas, TX 75380-0849

U.S. Department of Education
c/o FedLoan Servicing
P.O. Box 69184
Harrisburg, PA 17106-9184

US Dept of Education
Attn: Bankruptcy
Po Box 16448
Saint Paul, MN 55116-0448

Angel M. Hughes
37 N Latrobe Ave
Chicago, IL 60644-3333

Jason Blust
Law Office of Jason Blust, LLC
211 W. Wacker Drive
Ste. 300
Chicago, IL 60606-1390

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Tom Vaughn
55 E. Monroe Street, Suite 3850
Chicago, IL 60603-5764

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Portfolio Recovery Associates, LLC
Successor to CAPITAL ONE BANK (USA) N.A.
(CAPITAL ONE BANK, N.A.)
POB 41067
Norfolk, VA 23541

Prestige Financial Services
Attn: Bankruptcy
1420 South 500 West
Salt Lake City, UT 84115

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Americash Loans	End of Label Matrix	
PO Box 184	Mailable recipients	23
Des Plaines, IL 60016-0003	Bypassed recipients	1
	Total	24

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Angel Hughes

Debtor

)
) **Case No: 17 B 11836**
) **Judge: Doyle**
) **Chapter 13**
)

MOTION TO MODIFY PLAN

Now comes Angel Hughes (hereinafter referred to as “Debtor”), by and through her attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

1. On April 14, 2017 the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on June 20, 2017. The confirmed plan called for monthly payments of \$400.00 for 60 months, paying unsecured creditors a minimum of 10% on their claims.
3. The Debtor fell behind on plan payments because she incurred auto repair expenses totaling approximately \$1,000.00.
4. In addition, the Debtor’s plan is currently running beyond 60 months.
5. To fix both the default in her case and the allow the plan to complete on time, the Debtor believes she can afford an increased plan payment of \$455.00 if her current default is deferred to the end of the plan (see attached Amended Schedules I and J, referred to as “Exhibit”).
6. If the Debtor’s plan payment is increased to \$455.00 and her default is deferred, the unsecured creditors will still receive 10% on their claims, and the plan will complete within 60 months.

WHEREFORE, Debtor prays that this Honorable Court enter an Order:

1. Increasing her plan payment to \$455.00;
2. Deferring her current plan payment default; and
3. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

/s/ Michelle K. Hinds
Michelle K. Hinds
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 300
Chicago, IL 60606
312-273-5001